



US EPA, Region 9
NPDES/Pacific SW Region
75 Hawthorne Street
San Francisco, CA 94105-3901
Attn: Adam Howell

January 2, 2020

RE: NPDES General Permit No. CAG280000 Inspection – Platform Eureka – September 24, 2019

Dear Mr. Howell,

Beta Operating Company LLC dba Beta Offshore is in receipt of your inspection report dated November 25, 2019. This letter is sent as a follow-up within 45 days in accordance with your request.

Upon receipt of the letter and report, a factual discrepancy was observed. Subsequently, I contacted you to by phone to clarify the area of concern identified in your letter. During our conversation on November 26, 2019 at 10:02 am, I confirmed that Beta Offshore performs the recordkeeping and measurement of NPDES Permit CAG280000 Discharge 003 volumes and reports them quarterly according the Permit (§II.C.) in the EPA NetDMR online reporting portal. During our conversation, you agreed that a misunderstanding of reporting process at Platform Eureka may exist.

Per our discussion, the following revisions below are provided as an opportunity to clarify some of the facts presented in Section II.2 of the narrative in the EPA's report.

SECTION II.2. Wastewater Sources

Produced Water (Discharge 002) is a by-product of crude oil and natural gas extraction on Platform Eureka. Produced water ~~and crude oil are is commingled with graywater and other sources and sent to Platform Elly (through Platform Ellen) for processing treatment.~~ *At Platform Elly, the fluids are separated into three streams: oil, produced water and natural gas. The oil is shipped to shore via a subsea pipeline. The produced water is processed and some produced water is returned to Platform Eureka and Platform Ellen for injection into the reservoir or geologic formation. The produced natural gas is utilized in turbines to generate power for the facilities.* Platform Elly has monitoring requirements for produced water discharge of 10,950,000 bbls. Platform Elly has monitoring requirements for *discharged* produced water for oil & grease (daily), toxicity (quarterly) and zinc (annually). The Permit sets limits on oil & grease concentrations in discharged produced water of 29 mg/L monthly average and 42 mg/L daily maximum.

Well Treatment Completion and Workover Fluids (Discharge 003) are comingled with produced fluids water, then sent to Platform Ellen ~~and comingled with produced water from that Facility and then sent to Platform Elly for treatment.~~ Elly for processing as described in the paragraph above. Well Treatment Completion and Workover Fluids (WTCWF) are utilized during well workover operations. Trace amounts of the WTCWF may be detected in the produced water once the well is returned to production. There have been no discharges of WTCWF (003) fluids for many years.

Thank you for the opportunity to comment on the report of EPA's inspection in September 2019. Beta Offshore is dedicated to being a responsible offshore operator, is committed to fully comply with the Clean Water Act.

Please feel free to contact me if you have any question or require further information.

Sincerely,

A handwritten signature in black ink that reads "Diana Lang". The signature is written in a cursive, flowing style.

Diana Lang
Beta Offshore
HSE Manager

cc: Eric Willis – General Counsel
Dan Steward – Vice President, Beta Operations